

**Exhibit A**

**Proposed Litigation Schedule**

**Path A: Address Motion to Dismiss on the Current Record as a Threshold Issue**

Date	Motion to Dismiss or Lift Stay
10/17/2022	Objections due
11/07/2022	Replies due
Week of 11/14/2022	Hearing

**Path B: Coordinate Discovery and Other Proceedings on All Plan-Related Issues**

Date	Motion to Dismiss/ Lift-Stay	Adversary Proceedings	Plan Confirmation
10/14/2022		Amended complaints due	
10/28/2022		Answers and counter/cross-claims due.	Proposed plan and disclosure statement due
12/02/2022	Substantial completion deadline for production of documents in all disputes		
12/13/2022			Objections to disclosure statement due
12/27/2022			Reply to objections to disclosure statement due
01/03/2022			Hearing on disclosure statement
01/20/2023	Opening expert reports due in all disputes		
02/17/2023	Rebuttal expert reports due in all disputes		
03/10/2023	Discovery closed in all disputes		
03/10/2023			Plan confirmation order due
03/24/2023	Response due	Motions for summary judgment due	
03/31/2023			Voting deadline; objections to plan due
04/10/2023			Proposed findings of fact and conclusions of law due
04/14/2023	Replies due	Oppositions to summary judgment motions due	Replies to confirmation objections due; objections to FF&CC due
04/21/2023		Replies in support of summary judgment due	
04/24/2023	Exhibit list, witness lists due in all disputes		
04/27/2023	Objections to exhibit list due in all disputes		
Week of 05/01/2022	Hearing on all disputes		